

# ANTI-BRIBERY & ANTI-CORRUPTION POLICY

REFERENCE	EFFECTIVE DATE	OWNER
1.2	March 2026	Legal

## 1. PURPOSE AND SCOPE

The Anti-Bribery & Anti-Corruption (**ABAC**) Policy provides clear guidelines about the types of activities that may constitute corruption, a bribe, or an act of bribery. Aristocrat does not tolerate acts of bribery and corruption and engaging in, authorising, or permitting any such conduct is strictly prohibited.

## 2. APPLICABILITY

This Policy applies to all businesses and activities of Aristocrat Group (**the Group**) operating globally (including all subsidiaries) and to all directors (executive and non-executive), employees (full time and part time), and contingent workers of the Company including independent third-party consultants, contractors and subcontractors, and temporary workers (collectively, **Employees**).

Every Employee has a responsibility to act ethically and legally in every situation they face at Aristocrat and to ensure they comply with our Values to avoid disciplinary action which could include termination of employment. Our Values can be accessed through the [Ally](#) Employee intranet or via our [website](#).

## 3. WHAT IS BRIBERY AND CORRUPTION?

**Bribery** means knowingly giving or receiving, or agreeing to give or receive, an undue reward, whether financial or non-financial, to influence the behaviour of someone in government or business either in their personal or official capacity, to obtain a commercial or personal advantage. Examples include giving improper payments or benefits to public officials or paying secret commissions to an agent. A bribe does not have to be actually given – the intent to give a bribe is sufficient to be deemed a bribe.

This definition includes Indirect Bribery, which occurs where a third party such as an agent, distributor, service provider, joint venture partner, or anyone acting in a fiduciary capacity (either an individual or an organisation) commits an act of bribery when acting on Aristocrat's behalf.

**Corruption** is the willingness to act dishonestly or misuse one's entrusted power or position for personal, commercial, or organisational advantage.

## 4. WHY IS THIS IMPORTANT?

Aristocrat is committed to conducting business lawfully and ethically. Employees must not engage in conduct that breaches applicable laws, regulatory requirements, or Aristocrat's policies, or that could compromise the reputation of Aristocrat or its business partners.

Most countries where we operate have legislation or are subject to legislation that aims to prevent Bribery and Corruption. Individuals and companies can be prosecuted for actions that occur anywhere in the world through various laws including the UK Bribery Act 2010, the USA Foreign Corrupt Practices Act and Anti-Kickback Statute, and the Australian Criminal Code Act 1995 (Cth).

Penalties for failing to comply with these laws or failing to report suspected breaches of relevant legislation or this Policy are significant and can include:

- civil and criminal liability for Aristocrat;
- individual liability for Employees (including fines); and
- increased operational costs and reputational damage.

## 5. PROHIBITED CONDUCT

Aristocrat does not tolerate Bribery or Corruption, and all such acts are strictly prohibited. Employees must act lawfully and ethically in all business dealings and must not engage in, authorise, or permit any of the following conduct:

### 5.1. BRIBERY

Employees must not offer, promise, give, request, or accept any bribe as defined above in section 3. A bribe does not need to be effectuated; intent to bribe is sufficient for an act to be deemed a bribe whether the recipient is in the public or private sector.

### 5.2. INDIRECT OR THIRD-PARTY BRIBERY

Employees must not engage in Indirect Bribery through third parties such as agents, distributors, consultants, contractors, joint venture partners, or any person acting on Aristocrat's behalf. Aristocrat can be held liable for the actions of third parties who act or are perceived to act on our behalf.

Employees must not authorise payments, ignore warning signs of improper conduct, or permit arrangements where there is a risk that any payment (directly or through a third party) may be used for improper purposes.

### 5.3. IMPROPER HOSPITALITY

Employees must not offer or accept gifts, meals, entertainment, travel, or other such benefits (collectively, **hospitality**) that could improperly influence, or appear to influence, a business decision or regulatory outcome.

Hospitality offered to advance a potential business transaction or regulatory approval, secure an advantage, reward favourable treatment, or create a sense of obligation are strictly prohibited.

Employees must not offer or provide hospitality to Government Officials, regardless of the value.

### 5.4. IMPROPER CHARITABLE OR POLITICAL CONTRIBUTIONS

Employees must not make charitable or political contributions on behalf of Aristocrat to influence a business decision, regulatory outcome, or a Government Official. All charitable and political contributions must comply with applicable policies and legal requirements as outlined below in sections 6 and 7, respectively.

Contributions that create actual or perceived Conflicts of Interest are prohibited. Refer to the [Conflicts of Interest Policy](#) for further information.

### 5.5. FACILITATION PAYMENTS

Employees must not make facilitation payments, which are unofficial payments made to secure or expedite routine government actions. Such payments are inconsistent with Aristocrat's standards, regardless of local custom or practice.

## 5.6. BOOKS AND RECORDS MISCONDUCT

Employees must not falsify, conceal, mischaracterise, or omit information in Aristocrat's books and records relating to offers of hospitality, whether as host or recipient. All transactions must be recorded transparently and reflect their true nature and purpose. Undisclosed side agreements, off-book accounts, disguised payments, deflated invoices, or inaccurately reported expenses claims are prohibited. Refer to the [Fraud Control Responsibilities Policy](#) for further information.

## 5.7. RETALIATION

Employees must not retaliate against any person who, in good faith, raises a concern or reports suspected misconduct involving Bribery or requests to alter invoices. Retaliation includes (but is not limited to) dismissal, threats, or other unfavourable treatment due to raising a concern.

## 6. STANDARDS FOR CHARITABLE CONTRIBUTIONS

Charitable contributions may be made on behalf of Aristocrat subject to the appropriate pre-approval and only for bona fide charitable purposes, *i.e.*, for which no tangible benefit is received or is expected to be received by Aristocrat. Employees must not make charitable contributions to organisations associated with Government Officials or to influence governmental action. Refer to our [Donations, Sponsorship and Charitable Contributions Policy](#) for further information.

## 7. STANDARDS FOR POLITICAL CONTRIBUTIONS

Political contributions made on behalf of Aristocrat are only permissible in the USA and under all of the following conditions:

- The contribution is to a non-candidate political group (527 groups) or a non-partisan policy group (501(c)(3) organisations);
- The proposal has been evaluated and approved in writing by the Aristocrat Government Relations Committee (**GR Committee**), which is comprised solely of USA Persons from Government Relations and Legal;
- The GR Committee confirms alignment with USA GR Policy initiatives;
- The recipient has been advised in writing to use the contribution for administrative, operational, educational, or general membership functions and not for campaigns or elections, including fundraising events; AND
- The funds are sent from a USA entity, *e.g.*, Aristocrat Technologies, Inc.

No corporate political contributions are permitted outside of the criteria outlined above. Direct contributions to Political Parties and Politicians of any kind on behalf of Aristocrat are strictly prohibited. Contributions include cash or other donations, sponsorships or charitable contributions, gifts, gratuities, benefits, or any free-of-charge services. Accordingly, contributions of any kind must be evaluated by the GR Committee prior to offering such contributions.

Furthermore, Aristocrat has adopted a strict framework for personal political contributions made by the Chief Executive Officer and Managing Director and Non-Executive Directors and their spouses. For these individuals, personal political contributions are prohibited unless you are a USA citizen making a payment to a USA political party or candidate and where gaming laws do not prohibit such payment.

## 8. STANDARDS FOR HOSPITALITY

All offers of hospitality, whether as host or recipient, must be:

- **reasonable in value;**
- **non-extravagant;** and
- **linked to a business purpose.**

Before providing or accepting hospitality, Employees must assess whether the proposed activity complies with this Policy:

- **Intent** – Hospitality must be provided or accepted solely for legitimate business purposes, such as building a business relationship or demonstrating business courtesy. Hospitality must not be offered or accepted where the purpose, or perceived purpose, is to influence objectivity in a business decision, secure an advantage, or reward favourable treatment.
- **Proportionality and Frequency** – Hospitality must be reasonable in value and in frequency according to the nature of the business relationship. Hospitality must not be excessive, frequent, or disproportionate to the business context.
- **Legality** – Hospitality must comply with applicable laws in both the Employee's jurisdiction and the jurisdiction of the commercial counterparty. If you are uncertain about the legality, consult the Financial Crime Prevention (FCP) Team in Legal before proceeding.
- **Compliance with Counterparty Rules** – Hospitality must comply with the recipient's organisational policies and rules and Employees must confirm before offering. Most jurisdictions prohibit Government Officials from accepting hospitality.
- **Transparency** – Hospitality must withstand internal and external scrutiny. Employees must not offer or accept any hospitality that could cause reputational harm or that they would be unwilling to disclose to their manager, colleagues, regulators, or the public.
- **Consistency** – Hospitality must reflect consistent standards of conduct, whether offered or received. Employees must consider double-standards and must not offer any hospitality or benefit that they would consider inappropriate to accept in comparable circumstances.

### 8.1. GOVERNMENT OFFICIALS

Government Officials are highly regulated and generally cannot accept any hospitality. Caution must be taken when dealing with Government Officials, particularly when the nature of their role, their status as a Government Official, or their connection with an intermediary is not clear. If you are uncertain, consult the FCP Team in Legal before proceeding.

Government Official includes (without limitation) government employees, government contractors, statutory officeholders, judicial officeholders, public international organisation employees, politicians (including candidates for office), members of royal families, or members of political parties. For the avoidance of doubt, an employee of a gaming regulator (including a tribal gaming regulator) is considered a Government Official.

Refer to the [Dealing with Government Officials and Political Parties Policy](#) for further information.

### 8.2. COMPLIANCE WITH LOCAL LAWS

Employees are responsible for understanding local customs regarding the giving or receiving of hospitality and must comply with all rules, regulations, and laws of the jurisdictions in which they conduct business.

Additionally, there are specific gaming regulations in some jurisdictions including Australia that prohibit providing the following types of hospitality to any customer:

- Travel or Accommodation of any nature (whether Aristocrat-paid or subsidised);
- Hospitality (e.g., drinks/meals) not linked to a legitimate business purpose;
- Entertainment (e.g., sporting events or concert tickets);
- Customer use of Aristocrat golf memberships or other golf outings;
- Study Tours; or
- Any hospitality offered with an implied expectation of further sales.

Gaming regulations in other jurisdictions may impose similar limitations. If you are uncertain about the limitations in a certain jurisdiction, consult Gaming Compliance before proceeding.

**8.3. APPROVAL THRESHOLDS**

Offers of hospitality, whether as host or recipient, must meet ethical standards, comply with applicable laws, and align with the Approval Thresholds outlined in the following matrix. Disclosures under this Policy must be submitted and recorded in Protecht and are subject to manager review. **Any exceptions to these Approval Thresholds must also be approved by the FCP Team in Legal before offering or accepting.**

If the proposed activity presents elevated legal, regulatory, or reputational risk, the FCP Team will discuss the request with the Chief Legal Officer (CLO) or the Chief Compliance Officer (CCO) before providing a decision. If an exception cannot be granted through this review, the requestor may escalate the proposal to the Chief Executive Officer (CEO) and/or the Regulatory and Compliance Committee (RCC) for further consideration and a final decision.

Employees must obtain approval **prior to** providing or receiving hospitality that exceeds the per person thresholds provided in the following table:

Recipient	Meals & Entertainment <i>(per person incl. tip and taxes)</i>	Gifts <i>(per person incl. tip and taxes)</i>	Travel & Accommodation
<b>Government Official</b>	<b>Not permitted without prior written approval</b>	<b>Not permitted without prior written approval</b>	<b>Not permitted without prior written approval</b>
<b>Tribal Regulator</b>	Up to USD \$50	Up to USD \$50	<b>Not permitted without prior written approval</b>
<b>Commercial Counterparty*</b>	Up to USD \$400	Up to USD \$150	<b>Not permitted without prior written approval</b>
<b>Acceptance by Aristocrat Employees</b>	Up to USD \$150	Up to USD \$150	<b>Not permitted without prior written approval</b>

\* **Commercial Counterparties** include customers, suppliers, vendors, consultants, business associates, agents, distributors, service providers, joint venture partners, and anyone acting in a fiduciary capacity.

- If a recipient falls into two categories, the more restrictive threshold applies. For example, if the Chairman or the Chief of the Tribal Gaming Commission (Tribal Regulator) is also the CEO of the Casino (Customer), the Tribal Regulator threshold applies. Similarly, if a customer also acts in a regulatory capacity, Government Official standards apply.
- Requests involving concerts and sporting events, whether as host or recipient, are evaluated based on the face value or fair market value of a ticket plus estimated meal costs. This includes events in our corporate box. In addition to value, such requests are assessed based on the frequency, timing, and the overall pattern of hospitality provided to or received from the Commercial Counterparty.
- Travel presents a significant corruption risk and should not be accepted or offered unless it is strictly necessary for a legitimate business purpose, complies with applicable law, and has been approved under this Policy.
- Offers of hospitality that do not exceed the thresholds above must still comply with the recipients' policies; always check before making an offer.
- Direct reports of the CEO must not accept hospitality valued more than the per person thresholds provided in the table above without approval from the CLO or the CCO. In addition, direct reports of the CEO must disclose any hospitality received that is material in value, frequency, source, or context. Hospitality is material where it could reasonably give rise to a perception of influence, create reputational or regulatory risk, or be considered significant in the context of the recipient's role and decision-making authority.

#### 8.4. GIFTS

Employees must not give or accept gifts of value that exceed the per person thresholds provided above without prior approval from the FCP Team in Legal. Gifts should only be given or accepted with the full knowledge of the Commercial Counterparty's rules.

Employees must not give or receive cash or cash equivalents such as gift cards.

Aristocrat will only reimburse expenses relating to entertainment or gifts that are appropriately claimed with receipts. Aristocrat reserves the right to seek confirmation from the Commercial Counterparty as to the nature, extent, and hospitality received following a claim for reimbursement for hospitality expenses.

## 9. REPORTING

A key component in Aristocrat's comprehensive listening strategy is our Whistleblower Program, which is built to help identify and address any instances of corruption, illegal, or undesirable conduct, and to encourage and protect those who report their concerns.

If you see something that doesn't seem quite right, you have a doubt about a certain incident, or are uncertain whether something could be construed as a bribe or an act of corruption, please speak to the FCP Team in Legal, your manager, your local People & Culture Business Partner, or another leader in the business. They are all available to listen and help determine the appropriate response based on the issue.

If you come across a potentially serious matter, we encourage you to report your concerns to an Eligible Recipient or via the EthicsPoint portal. The portal is operated by a third party, independent of Aristocrat, and offers a secure, anonymous way to raise your concerns. It is accessible globally, 24 hours a day, 7 days a week and protections are provided to people using the program.

Refer to Aristocrat's [Global Whistleblower Policy](#) for further information.

## 10. TRAINING

Aristocrat's online training courses on Anti-Bribery and Anti-Corruption must be completed by all Employees within 90 days of their commencement with Aristocrat. In addition, periodic mandatory face-to-face training will be delivered to employees and teams with elevated exposure to Bribery and Corruption about how to recognise and deal with it.

## 11. PERIODIC REVIEW OF POLICY

This Policy will be periodically reviewed to ensure it is operating effectively and remains up to date with applicable laws, regulatory requirements, and organisational risk. If substantive changes are made, the Policy will be relaunched for acknowledgement by all Employees.

## 12. BREACH OF POLICY

Any breach of this Policy will be communicated to the CEO, who will report the breach to the RCC when appropriate.

Breaches of legislation that aims to prevent Bribery and Corruption must be reported to the RCC.

## 13. RESPONSIBILITY AND ACCOUNTABILITY

Chief Legal Officer

## 14. REFERENCE DOCUMENTS

[Conflicts of Interest Policy](#)

[Dealing with Government Officials and Political Groups Policy](#)

[Donations, Sponsorship and Charitable Contributions Policy](#)

[Global Whistleblower Policy](#)